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CITY CLERK
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

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8 | IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

9 | IN AND FOR THE COUNTY OF KING

10| ANDREA LISTER in her individual |

11| capacity and family PLAINTIFF, | NO.

17-2-14474-0 SEA

12| v. |

13| COS, Prosecutors, Marshal(s) TBA | SUMMONS (20 DAYS)

14| Seattle Police Dept + Officers TBA |

15| King County Et, Al., KC Prosecutors |

16| KC DAJD, EE's, Sargeants, CO's |

17| John & Jill Doe(s), Public Defense TBA |

18| DEFENDANTS |

19| THE STATE OF WASHINGTON TO: the defendants named above.

20| A lawsuit has been started against you in the above-entitled court by

21| the above-entitled Plaintiff. Plaintiff's claim is stated in the written

22| complaint, a copy of which is served upon you with this summons.

23| In order to defend against this lawsuit, you must respond to the

24| complaint by stating your defense in writing, and by serving a copy upon the

25| undersigned person within twenty (20) days (if served within the State of

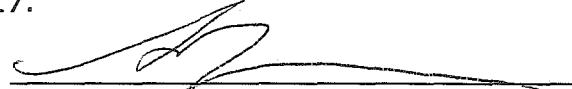
1 | Washington) or within sixty (60) days (if served outside the State of
2 | Washington) after the date of service on you of this Summons, excluding the
3 | day of service, or a default judgment may be entered against you without
4 | notice. A default judgment is one where plaintiff is entitled to what is asked
5 | for because you have not responded. If you serve a notice of appearance on
6 | the undersigned attorney, you are entitled to notice before a default
7 | judgment may be entered.

8 | If previously not filed, you may demand that the plaintiff file the
9 | lawsuit with the court. If you do so, the demand must be in writing and must
10| must be served upon the person signing this summons. Within fourteen (14)
11| days after you serve the demand, the plaintiff must file this lawsuit with the
12| Court, or the service on you of this summons and complaint will be void.

13| If you wish to seek the advice of an attorney in this matter, you should
14| do so promptly so that your written response, if any, may be served on time.

15| This summons is stated pursuant to Rule 4 of the Superior Court Civil
16| Rules of the State of Washington.

17| DATED June 4, 2017.



18|
19| Andrea Lister, Attorney Pro-Se, Plaintiff
20| email: todaysgirlfriday@gmail.com
21| 1728 E. Olive Street #3-706
22| Seattle, WA 98122

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25|

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1 | 17 AUG -9 AM 10:56

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MAYOR'S OFFICE

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2017 AUG -8 AM 11:46

CITY CLERK

3 | KING COUNTY
SUPERIOR COURT CLERK
4 | SEATTLE, WA

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8 | IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

9 | IN AND FOR THE COUNTY OF KING

10| ANDREA LISTER in her individual |

11| capacity and family PLAINTIFF, | NO.

12| v. | 17-2-14474-689A

13| COS, Prosecutors, Marshal(s) TBA | COMPLAINT FOR

14| Seattle Police Dept + Officers TBA | DAMAGES

15| King County Et, Al., KC Prosecutors |

16| KC DAJD, EE's, Sargeants, CO's |

17| John & Jill Doe(s), Public Defense TBA |

18| DEFENDANTS |

19| COMES NOW Plaintiff ANDREA LISTER by and through herself

20| PRO-SE as the interim attorney of record and states and alleges as follows:

21|

22| **I. PARTIES, JURISDICTION, AND VENUE**

23| 1. The Plaintiff at all times relevant herein were the residents of Seattle,

24| King County, Washington.

25| 2. Defendant(s) on information and belief, and at all material times

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CITY OF SEATTLE

1 | material hereto, Defendants all worked in the Municipality of doing business
2 | in Seattle, King County, Washington. All acts alleged herein were performed
3 | as policy of the above agencies and also individually, on behalf of, and in
4 | furtherance of their employment with the above agencies and actions of each
5 | is sued under the tortious claims method.

6 | 3. Between 01/01/05 and until presently, and on information and belief,
7 | experience and conduct of the above policies, procedures, loss of unlawful
8 | behaviors of the individuals collaboratively who conducted such treacherous
9 | acts and violations of harm, abuse, degradation, violence, embarrassment,
10| loss of rights, loss of consortium, loss of income, loss of assets, court cases,
11| civic liabilities, civil liberties, withholding pro-se status, loss of employment,
12| violations of constitutional rights & protections and as a pre-trial detainee
13| too many to list occurred towards wrongful arrest, conviction, incarceration
14| and police, prosecutor, & judicial malfeasance of these resulting from the
15| actions over the time specified and injustices occurring as a result. Loss of
16| freedom, emotional distress, pain/suffering. The material events & tortuous
17| conduct alleged herein occurred in Seattle, in King County, Washington.

18| 5. Jurisdiction and venue are properly before the Court.

19|

20| **II. FACTS and III. CAUSES of ACTION**

21| 6. Between the above dates, Andrea Lister was subjected to civil and
22| criminal behaviors from employees of the above agencies, government victim
23| municipalities/county and the powers of the State as she was actually the
24| victim of Domestic Violence at the hands of Daniel Calvin Wiseman of West
25| Seattle. She was subjected to horrible crimes of cruel and unusual

1 | punishments, not only including excessive solitary confinement, harsh
2 | conditions, but numerous violations of law as to pre-trial detainees, of
3 | statutes, regulation, and /or ordinance, policies, protocols, and conditions
4 | of confinement, health and welfare violations, lack of exercise, due care and
5 | duties which include, but are not limited to: exercising due care and caution
6 | as the conditions required; maintaining laws and safety of prisoners as
7 | detainees pre-trial required of a reasonable and prudent employee under
8 | the circumstances while operating as an employee within the City, County
9 | and State of Washington.

10| 7. As a direct and proximate result of the employees actions Andrea Lister
11| Plaintiff(s) sustained bodily injuries resulting in pain and suffering,
12| aggravation, inconvenience, emotional distress and disturbance, and
13| reduction in the capacity to enjoy life in the past, present, and possibly
14| future entitling Plaintiffs to recover general damages in the amounts not
15| now precisely known, but to be proven at the time of trial. As well as access
16| to competent counsel, proper healthcare and all other records and files.

17| 15. As a further direct and proximate cause of the tortuous acts of these
18| employees the Plaintiffs suffered the following only a partial stated list of
19| damages which also include, but are not limited to the following: property
20| damage; loss of use of property; past, present, future medical expenses;
21| past, present, future loss of income; reduction in earning capacity; loss of
22| consortium, permanent disability & impairment; medical out of pocket, other
23| miscellaneous expenses related to the plaintiffs' injuries; costs & reasonable
24| attorney's fees; & other costs of further damages as shall be proven at trial.

25 | **IV. LIMITED PHYSICIAN-PATIENT WAIVER**

1 | Plaintiffs hereby waives the physician-patient privilege only to the
2 | extent required by RCW 5.60.060, as limited by Plaintiffs' Constitutional
3 | Rights of Privacy, contractual rights of privacy, and the ethical obligations
4 | of physicians and attorneys not to engage in ex parte contact between the
5 | treating physician and the patient's legal adversaries or their representatives.

6 | **V. PRAYER FOR RELIEF**

7 | WHEREFORE, Plaintiffs pray for relief as follows:

8 | 1. For judgment against all defendants jointly and severably and as
9 | for general and special damages suffered by Plaintiff(s) in an amount to be
10| determined at trial; specifying all available total possible damages by law.
11| 2. For Plaintiffs' taxable costs and attorneys fees incurred herein; and
12| also Pro-se fees
13| 3. For such other and further relief as the court deems just.

14| DATED June 4, 2017.



15| 16| Andrea Lister, Attorney Pro-Se, Plaintiff

17| 18| email: todaysgirlfriday@gmail.com

19| 20| 21| 22| 23| 24| 25| 1728 E. Olive Street #3-706

Seattle, WA 98122